

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE DISTRICT OF DELAWARE**

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In re: : Chapter 11

          :

Marcia Samuel, : Case No. 16-11833-pmm

          :

          : RE DOCKET NO 105

Debtor.

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**SECOND SUPPLEMENTAL APPLICATION FOR COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOLLOWING THE CONFIRMATION OF  
DEBTOR’S CHAPTER 13 PLAN**

Mark M. Billion, Esquire, applies under § 330 of the Code for an award of compensation and reimbursement of actual, necessary expenses and represents:

1. Applicant is counsel for the Debtor.
2. The debtor filed a petition under Chapter 13 of the Bankruptcy Code on 03/17/16.
3. The debtor’s annualized current monthly income as set forth on Form 122C-1 is:

XX (\$83,098.08) Above median (the amount on line 15b is not less than the amount on line 16c)

\_\_\_ Below median (the amount on line 15b is less than the amount on line 16c).

4. The Debtor's Chapter 13 Plan was confirmed by the court on 01/12/2017. Two modifications, as well as a reply to a motion to dismiss, were completed and these are the matters for which compensation is sought. Compensation was previously provided for the initial modification.

5. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the Debtor, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable.

6. Applicant requests an award of supplemental compensation of \$1,500.00 for the flat fee in providing the following services: prosecution of the motion to modify the confirmed plans and respond to the motion to dismiss (Docket No. 105).

January 8, 2021

BILLION LAW

/s/ Mark M. Billion

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Mark M. Billion (DE Bar No. 5263)  
1073 S. Governors Ave  
Dover, DE 19904  
Tel: 302.428.9400  
Fax: 302.450.4040  
markbillion@billionlaw.com

*For the Debtor*

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
	:	
	:	Case No. 16-11833-pmm
Marcia Samuel,	:	
	:	RE DOCKET NO 105

Debtor.

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**NOTICE: SECOND SUPPLEMENTAL APPLICATION FOR COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOLLOWING THE CONFIRMATION OF  
DEBTOR'S CHAPTER 13 PLAN**

Mark M. Billion, Esquire, of Billion Law, has filed an Application for Compensation and Reimbursement of Expenses Following the Confirmation of Debtor's Chapter 13 Plan in the present Chapter 13 Bankruptcy.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have on in this Bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the Application or if you want the court to consider your views on the Application, then on or before February 8, 2021, you or your attorney must do the following:

a. File an answer explaining your position at Office of the Bankruptcy Clerk The Madison Building 400 Washington Street Reading, PA 19601 If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

b. Mail a copy of the Movant's attorney Mark M. Billion, Esquire Billion Law 1073 S. Governors Ave; Dover, DE 19904.

2. If you or your attorney does not take the steps described I paragraphs 1(a) and 1(b) above, the court may enter an order granting relief requested in the Application.

3. If a copy of the Application is not enclosed, a copy of the Application will be provided to you if you request a copy from the attorney named in paragraph 1(b).

4. You may contact the Bankruptcy Clerk's Office at (610) 208-5040 to find out whether the hearing has been cancelled because no one has filed an answer.

January 8, 2021

BILLION LAW

/s/ Mark M. Billion

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Mark M. Billion (DE Bar No. 5263)  
1073 S. Governors Ave  
Dover, DE 19904  
Tel: 302.428.9400  
Fax: 302.450.4040  
markbillion@billionlaw.com

*For the Debtor*

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE DISTRICT OF DELAWARE**

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In re: : Chapter 11

Marcia Samuel, : Case No. 16-11833-pmm

: RE DOCKET NO 105

Debtor.

----- x

**ORDER GRANTING SECOND SUPPLEMENTAL APPLICATION FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOLLOWING THE  
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2018, based  
on the Fee Application of Debtor's Counsel, it is hereby ORDERED that:

1. The Fee Application filed by Debtors' Counsel is hereby GRANTED in the amount of  
\$1,500.00; \$0.00 of which was previously paid leaving \$1,500.00 remaining to be paid.

BY THE COURT:

\_\_\_\_\_, U.S. Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE DISTRICT OF DELAWARE**

----- X

In re: : Chapter 11  
: :  
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Marcia Samuel, : Case No. 16-11833-pmm  
: :  
: RE DOCKET NO 105

Debtor.

----- X

**COS: ORDER GRANTING SECOND SUPPLEMENTAL APPLICATION FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOLLOWING THE  
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

A copy of this document, as well as the notice of hearing regarding the same, has been served by U.S. Post, First Class on all parties on Exhibit 1 hereto.

January 8, 2021

BILLION LAW

/s/ Mark M. Billion

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Mark M. Billion (DE Bar No. 5263)  
1073 S. Governors Ave  
Dover, DE 19904  
Tel: 302.428.9400  
Fax: 302.450.4040  
markbillion@billionlaw.com

*For the Debtor*

**Exhibit 1**

Label Matrix for local noticing  
0313-4  
Case 16-11833-ref  
Eastern District of Pennsylvania  
Reading  
Fri Jun 29 12:32:40 EDT 2018

Americredit Financial Services, Inc. dba GM  
P O Box 183853  
Arlington, tx 76096-3853

Borough of Bath  
c/o Portnoff Law Associates, Ltd.  
P.O. Box 3020  
Norristown, PA 19404-3020

Orion  
c/o Recovery Management Systems Corporat  
25 SE 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

Reading  
400 Washington Street  
Suite 300  
Reading, PA 19601-3951

(p)AMERICREDIT FINANCIAL SERVICES DBA GM FINAN  
PO BOX 183853  
ARLINGTON TX 76096-3853

Borough of Bath  
c/o James R. Wood, Esq.  
1000 Sandy Hill Road, Suite 150  
Norristown, PA 19401-4181

CAPITAL 1 BK  
11013 W BROAD ST  
None  
GLEN ALLEN, VA 23060-6017

CHASE  
P.O. BOX 15298  
None  
WILMINGTON, DE 19850-5298

CHASE MTG  
10790 RANCHO BERNA  
None  
SAN DIEGO, CA 92127-5705

Capital One Bank (USA), N.A.  
PO Box 71083  
Charlotte, NC 28272-1083

ERC  
PO BOX 57547  
None  
JACKSONVILLE, FL 32241-7547

I C SYSTEM  
PO BOX 64378  
None  
SAINT PAUL, MN 55164-0378

JP Morgan Chase  
PO BOX 24686  
Mail Code OH4-7302  
Columbus, OH 43224

JP Morgan Chase Bank, NA  
c/o Joshua I. Goldman, Esq.  
KML Law Group, PC  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1541

JP Morgan Chase Bank, NA  
c/o Thomas Puleo, Esq.  
KML Law Group, PC  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1541

JPMorgan Chase Bank, National Association  
Attn: Correspondence Mail  
Mail Code LA4-5555  
700 Kansas Lane  
Monroe LA 71203-4774

MIDLAND FUND  
2365 NORTHSIDE DRI SUITE 300  
None  
SAN DIEGO, CA 92108-2709

MIDLAND FUNDING LLC  
PO BOX 2011  
WARREN, MI 48090-2011

MOBILOANSLLC  
PO BOX 1409  
None  
MARKSVILLE, LA 71351-1409

(p)MUNICIPAL CREDIT UNION  
22 CORTLANDT STREET  
24TH FLOOR  
NEW YORK NY 10007-3153

Marcia Samuel  
246 S Walnut St.  
Bath, PA  
BATH, PA 18014-1031

Mark M. Billion  
Billion Law  
922 New Road  
Suite 2  
WILMINGTON, DE 19805-5199

Orion Portfolio Services LLC  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Orion Portfolio Services LLC  
c/o Recovery Management Systems Corp  
25 SE 2nd Avenue Suite 1120  
Miami, FL 33131-1605

Recovery Management Systems Corporation  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

TARGET N.B.  
PO BOX 673  
None  
MINNEAPOLIS, MN 55440-0673

(p)U S DEPARTMENT OF EDUCATION  
P O BOX 5609  
GREENVILLE TX 75403-5609

United States Trustee  
Office of the U.S. Trustee  
833 Chestnut Street  
Suite 500  
Philadelphia, PA 19107-4405

FREDERICK L. REIGLE  
Chapter 13 Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606-2265



MARK MATTHEW BILLION  
Billion Law  
922 New Road  
Suite 2  
Wilmington, DE 19805-5199

Marcia Samuel  
246 S Walnut St.  
Bath, PA 18014-1031

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

AMERICREDIT  
4001 EMBARCADARO  
None  
ARLINGTON, TX 76014

(d)Americredit Financial Services dba GM Fina  
PO Box 183853  
Arlington TX 76096

MUNCPL CR UN  
185 MONTAGUE ST  
None  
BROOKLYN, NY 11201

US DEP ED  
501 BLEEKER STREET  
None  
UTICA, NY 13502

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)JPMorgan Chase Bank, National Association

(d)AmeriCredit Financial Services, Inc. dba G  
P O Box 183853  
Arlington, TX 76096-3853

(d)Borough of Bath  
c/o Portnoff Law Associates, Ltd.  
P.O. Box 3020  
Norristown, PA 19404-3020

(u)ally fin  
Not Available  
None  
NA, NA NA

(u)trident  
Not Available  
None  
NA, NA NA

End of Label Matrix  
Mailable recipients 31  
Bypassed recipients 5  
Total 36